



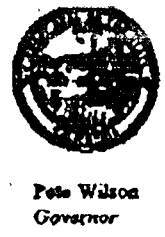
**Los Angeles
Regional Water
Quality Control
Board**

101 Ocean Plaza Drive
Monterey Park, CA
91754-2156
(213) 266-7500
FAX (213) 266-7600

May 9, 1997

**Mr. Michael Young
Integrated Environmental Services, Inc.
3990 Westery Place, Suite 210
Newport Beach, CA 92860**

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To <i>M. Young</i>	From <i>JR</i>	
Co.	Co.	
Dept.	Phone #	
Fax # <i>714/852-9011</i>	Fax #	



**SOIL STOCKPILE REPORT, AND POST-REMEDIAL EXCAVATION CONFIRMATION
SAMPLE REPORT, PARCEL A, REPORT No. 1 - McDONNELL DOUGLAS C-6
FACILITY - LOS ANGELES, CALIFORNIA (FILE NO. 100.315)**

We have received and reviewed the Soil Stockpile Report and the Post Remedial Excavation Report for Parcel A, Report No. 1, at the McDonnell Douglas C-6 Facility in Los Angeles, both dated May, 1997. The reports present the results of confirmation sampling in Building 37, and request approval to reuse, as backfill, soil stockpiled in five areas, on site. The stockpiled soil is for the most part from remedial excavation following demolition of Building 37, and "Volcano" soil. Our comments are as follows:

- Board staff were on site when Building 37 excavation was initiated, and specifically requested PCB analysis on Stockpiles B37-RE-1 and B37-RE-2. Provide us with PCB data for Stockpiles B37-RE-1 and B37-RE-2. This sampling and analysis can be performed after this stockpiled soil is returned to excavation areas and compacted.
- Also, a confirmation sample shall be collected from B37-GS-33 area, previously sampled on February 14, 1997, at 0.5' bgs which had significant levels of SVOCs and to verify that all phthalate contaminated soil has been removed.
- Remove the words "(VOCs)" and "(SVOCs)" from the table of "Permissible Concentrations" listed on page 4-2 of the Soil Stockpile Report. This table, with this change, is suitable for TPH soil screening criteria.
- The document compares chemical concentrations in the soil stockpiles to MDRC's Draft Health Based Screening Criteria (HBSC). We have not reviewed or approved MDRC's draft HBSC at this time and neither has DTSC. Pending final review and approval the use of these HBSC, proposed HBSC may be applied to these soil stockpiles reused on-site as detailed in the remaining items below.
- Regarding metals in soils, TTLC is not considered an appropriate soil screening criteria. However, since no significant levels of metals including chromium were present in total concentrations above Board criteria and no exceedances of 10 times STLC noted, the stockpiled soil is suitable for reuse. One exception was a single hit of high copper in the "Volcano" stockpile. Your followup soil sampling using four additional samples in the hot spot area provides adequate characterization and the stockpile is considered suitable for reuse on-site.
- All import material used as backfill must be certified clean fill. All import fill should be analyzed for the chemicals of concern prior to transporting to the site.



Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

Mr. Michael Young
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Your February 7, 1987 Work Plan for Post-Remediation Confirmational Sampling - Parcel A, should be updated and resubmitted to integrate these Soil Stockpile Reports and the Post Remedial Excavation Report activities for Parcel A.

For VOCs, all stockpile soil concentrations were well below our "No Risk" Interim Guidebook VOC Screening values and no additional health based screening is considered necessary for reuse on-site.

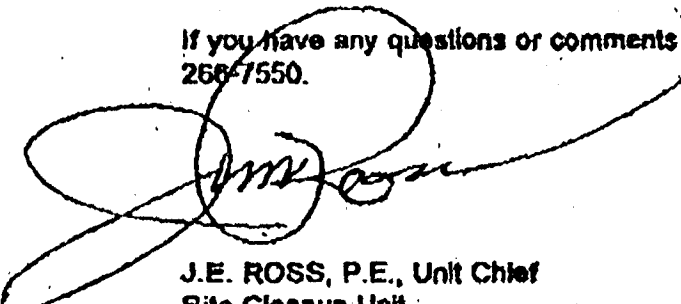
For SVOCs, stockpile RE-2 and 4 had values of SVOC, primarily phthalate and benzo(a)pyrene which had values above Water Board screening levels and PRG's, but that would not be considered any risk to groundwater. However, you calculated HBSC for these compounds, which you consider suitable for protecting of all in the shallow soil environment. We are recommending that these "hot spot" areas be carved out of RE-2 and 4 and off-hauled and then the remaining stockpile is considered suitable for reuse on-site. We would then requires follow-up "Post-Remediation" sampling to confirm the shallow soil meet HBSC when approved.

In summary, none of the soil exhibits significant levels of TPH, metals or VOCs. In all stockpiles, the primarily soil contaminant in soil excavated beneath building 37 was long chain (heavy end) petroleum hydrocarbon of C_{20} and above. These not only have no health based values, in accordance with our Interim Guidance for hydrocarbon impacted soil, would be considered low risk for impacting groundwater due to low mobility and low solubility and for TPH, no health risk evaluation is considered necessary. Additionally, no metals concentration including chromium were found at above 10 times STLC.

In the future, for all subsequent Phase II analyses, we have no objections to applying HBSC, approved by the DTSC, to soils at the site.

We are herewith approving the reuse on-site of all stockpiled soil in RE-1, 2, 3, 4 and "Volcano" with the minor exception noted in bullet 9 above.

If you have any questions or comments regarding the above, please contact me at (213) 266-7550.



J.E. ROSS, P.E., Unit Chief
Site Cleanup Unit

cc: Ms. Karen Baker, DTSC, Long Beach
Ms. Debbie Oudiz, Office of Scientific Affairs
Mr. Anand Rege, DTSC, Long Beach
Mr. Fred Strauss, Montgomery Watson, Inc.
Mr. John Johnson, Lockheed Martin
Mr. Jeff Dhont, Federal EPA



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